

To: Early, William[Early.William@epa.gov]
Cc: Isales, Lydia[Isales.Lydia@epa.gov]
From: Ajl, Diane
Sent: Wed 1/15/2014 4:06:32 PM
Subject: FW: WVA authorities summary document. with latest CWA 311 update-redline strike out version
WV final draft wv reg status SWERLO comments 1.15.14.docx

From: Corman, Bicky
Sent: Wednesday, January 15, 2014 10:32 AM
To: Isales, Lydia; Ajl, Diane
Subject: WVA authorities summary document. with latest CWA 311 update-redline strike out version

Here are OGC comments on the draft response authorities document.

We made one comment that was more of a legal nit/word-choice; and one more substantive legal comment, having to do with a substance and tank at the facility that might be subject to SPCC, although they were not the substance or tank at issue.

We look forward to reviewing your enforcement authorities document.

Please let us know if you have any questions on the attached, or if we can do anything else.

Thanks!

Bicky Corman

Deputy General Counsel

Office of General Counsel

U.S. Environmental Protection Agency

Corman.Bicky@EPA.gov

Desk: 202-564-2202

Cell: 202-465-5966